

EXHIBIT 2

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Attorneys for the THSH Claimants

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: SIPA LIQUIDATION
	:
BERNARD L. MADOFF INVESTMENT	: Case No. 08-01789 (SMB)
SECURITIES LLC	:
	: (Substantively Consolidated)
Debtor.	:
	:
	:
-----	X
	X
SECURITIES INVESTOR PROTECTION	:
CORPORATION	:
	:
Plaintiff,	:
	:
v.	:
	:
BERNARD L. MADOFF INVESTMENT	:
SECURITIES LLC,	:
	:
Defendants.	:
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**THSH CLAIMANTS' RESPONSES TO TRUSTEE'S
FIRST SET OF REQUESTS FOR ADMISSION**

Michael G. Tannenbaum, Robert E. Helpern, Vincent J. Syracuse, Joel S. Hirschtritt, Ralph A. Siciliano, and Neil E. Botwinoff (collectively, the "THSH Claimants"), by and through counsel Tannenbaum Helpern Syracuse & Hirschtritt LLP, hereby respond to the First Set of Requests for Admission (the "Requests") by Irving H. Picard, Trustee (the "Trustee") for the Liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") as follows:

GENERAL OBJECTIONS

The following General Objection applies to each of the Requests and shall have the same force and effect as if set forth in full in response to each individual Request:

1. THSH Claimants object to the definition of "Accountholder" as referring to P.J. Administrator, LLC ("P.J. Administrator"). As stated in their Objection to Determination of Claims (ECF No. 4525, the "Objection"), the assets invested by the THSH Claimants with BLMIS were owned and controlled directly by the THSH Claimants and P.J. Administrator acted solely as an administrator with respect to such assets. While THSH Claimants do not know, at this time, how BLMIS identified, recorded or otherwise referred to account 1KW387 (the "Account"), THSH Claimants were the true accountholders by virtue of their ownership of, and control over, the assets contained in the Account.

Request No. 1

Admit the Account was not titled in Your name.

Response to Request No. 1

THSH Claimants' have no knowledge or evidence of how BLMIS titled, recorded or otherwise referred to the Account and therefore deny Request No. 1, pending the Trustee's response to THSH Claimants' outstanding discovery requests.

Request No. 2

Admit You did not have an account in Your name at BLMIS.

Response to Request No. 2

THSH Claimants hereby incorporate their response to Request No. 1, *supra*.

Request No. 3

Admit You never received correspondence directly from BLMIS.

Response to Request No. 3

Admitted.

Request No. 4

Admit You never made a payment of cash directly to BLMIS for credit to an account in Your name.

Response to Request No. 4.

Admitted.

Request No. 5

Admit you never deposited securities directly with BLMIS.

Response to Request No. 5

Admitted.

Request No. 6

Admit You never withdrew funds directly from BLMIS.

Response to Request No. 6

Denied.

Request No. 7

Admit that any funds You received were transmitted to You from Accountholder.

Response to Request No. 7

Denied.

Request No. 8

Admit You did not receive investment statements from BLMIS in Your name.

Response to Request No. 8

Admitted.

Request No. 9

Admit You did not receive tax statements from BLMIS in Your name.

Response to Request No. 9

Admitted.

Request No. 10

Admit You never entered into any contracts in Your name with BLMIS.

Response to Request No. 10

Admitted.

Request No. 11

Admit Your only relationship to BLMIS existed by way of Your relationship to Accountholder.

Response to Request No. 11

Denied.

Request No. 12

Admit You did not have any control or investment discretion over any investment assets at BLMIS.

Response to Request No. 12

Denied.

Request No. 13

Admit that there was an Accountholder agreement that restricted management rights of members giving exclusive management and control of the Accountholder to the Administrator.

Response to Request No. 13

Denied.

Dated: New York, New York
October 21, 2015

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